

**To:** Bell, Brian[bell.brianc@epa.gov]; Ireland, Scott[ireland.scott@epa.gov]; Kuefler, Patrick[kuefler.patrick@epa.gov]  
**Cc:** JORDAN, SHERI[SJORDAN@idem.IN.gov]; Burget, Catherine A[CBurget@idem.IN.gov]; Higginbotham, Paul[PHIGGINB@idem.IN.gov]; RIGNEY, STAN[SRIGNEY@idem.IN.gov]  
**From:** IDEM OWQ WW Permits  
**Sent:** Fri 8/28/2015 7:31:10 PM  
**Subject:** Revised draft IN NPDES general permit for Ground Water Petroleum Remediation Systems ING080000  
[GWPR NPDES Permit ING080000 Redlined Draft 08282015.docx](#)  
[GWPR fact sheet redline 08272015.docx](#)  
[NOI Form ING080000 GWPR Discharges 08272015.doc](#)

On December 15, 2014 the Indiana Department of Environmental Management (IDEM) public noticed a draft of the new administrative NPDES general permit for groundwater petroleum remediation systems. The draft NPDES general permit differed from the NPDES general permit-by-rule mostly by virtue of the fact that it was in a new format. We are referring to this new format as an “administrative NPDES general permit” and it will supersede and replace the requirements for these discharges which are currently regulated under Article 15 of Title 327 of the Indiana Administrative Code.

The December 2014 draft general permit stated that its purpose was to establish requirements for point source discharges from any conveyance used for collecting and conveying wastewater which is directly related to ground water petroleum remediation systems or activities, but specifically those which involve gasoline contamination of the ground water. We had made this distinction due to concerns which had been raised by U.S. EPA during its early review of the initial draft general permit, because it only contained effluent limitations for benzene and pH. During the official public notice comment period, IDEM received several comment letters requesting that we expand the scope of the general permit coverage to include other types of petroleum-based contaminants, such as diesel fuel and kerosene, as these types of contaminants may also be present in the ground water due to leaking underground storage tanks at the gas stations and truck stops which are typical of the facilities with ground water remediation systems. After consultation with the staff of the Office of Land Quality’s Leaking Underground Storage Tank program, we have developed a second draft NPDES general permit which removes the restricted definition of “petroleum” to also be inclusive of diesel fuel, kerosene, and similar products that might be found at a gas station or truck stop, such that more facilities could be covered by the general permit.

The Environmental Rules Board final adopted the rule changes to 327 IAC 5 and 15 at its July 8, 2015 meeting. This is the rule change which enables IDEM to transition from the permit-by-rule to the administrative general permits for the 5 permits which were public noticed on December 15, 2014. We are anticipating the rule change to become effective in less than 90 days (by mid-November, 2015).

**Therefore we are asking that you give the 3 attached documents an expeditious review, so that we can complete the second public notice and have this permit ready to issue by the time the rule change goes into effect. The draft general permit and fact sheet are being transmitted to you as red-lined versions so that you can clearly see exactly what changes have been made to the documents since the first public noticed draft was released on December 15, 2014. Please focus your review on the edits of the documents in order to streamline the review time. If possible, we would really appreciate it if you could please review these documents and provide us with feedback by no later than Friday, September 11, 2015.**

Questions may be directed to any of the following IDEM staff: C. Anne Burget at (317) 234-8745, Sheri Jordan at (317) 232-8703, or Catherine Hess at (317) 232-8704. Please send any email inquiries to [owqwwper@idem.in.gov](mailto:owqwwper@idem.in.gov) which is a generic email address to which all 3 of us have access. We look forward to hearing from you.

Catherine Hess, Chief

Permits Administration Section

IDEM, Office of Water Quality

Email: [chess@idem.IN.gov](mailto:chess@idem.IN.gov)

Phone: (317) 232-8704